



**Chevron Chemical Company**

6001 Bollinger Canyon Road, San Ramon, California  
Mail Address: P.O. Box 5047, San Ramon, CA 94583-8947

San Francisco, CA  
October 8, 1992

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

**CHEVRON CHEMICAL COMPANY'S  
RESPONSE TO EPA REQUEST FOR  
INFORMATION ON THE BAY AREA  
DRUM SITE, SAN FRANCISCO, CA**

Ms. Monica Gan  
Department of Toxic Substances Control  
700 Heinz Avenue, Suite 200  
Berkeley, CA 94710-2737

Dear Ms. Gan:

Attached is the response of Chevron Chemical Company to Barbara J. Cook's Request for Information dated August 31, 1992 for the Bay Area Drum Site in San Francisco, CA.

In summary, we were not able to detect any use of the Bay Area Drum Site by Chevron Chemical Company. Chevron Chemical Company in Richmond, California operated its own drum reconditioning plant, therefore, there was no need to utilize the Bay Area Drum Site.

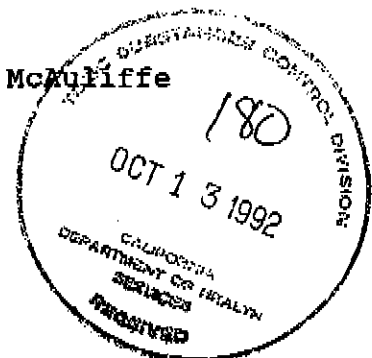
We request that you please remove Chevron Chemical Company's name from your list of PRP's. I can be reached at P.O. Box 7924, San Francisco, CA, 94120, or at 415-894-2622.

Sincerely,

D.P. Tagliareni  
Superfund Specialist

DPT  
Attachment

cc: Joseph J. Armao - Heller, Ehrman, White & McKuliffe



RESPONSE OF CHEVRON CHEMICAL COMPANY TO DTSC'S REQUEST FOR  
INFORMATION DIRECTED TO CHEVRON CHEMICAL COMPANY, DATED AUGUST 31,  
1992, REGARDING THE BAY AREA DRUM SITE IN SAN FRANCISCO, CA.

1. The approximate number of drums shipped to the BAD Site between 1948 and 1987.

Response: To the best of our knowledge Chevron Chemical Company (CCC) has never shipped any drums to the BAD Site.

2. The nature of the substances contained in the drums, including chemical composition and concentration.

Response: Not applicable, see Response #1.

3. The type and capacity of each drum.

Response: Not applicable, see Response #1.

4. The disposition of subject drums after the substances were used.

Response: Not applicable, see Response #1.

5. The residual level in each drum after they were shipped off-site.

Response: Not applicable, see Response #1.

6. Methods used to determine the residual levels in each drum.

Response: Not applicable, see response #1.

7. Purpose of drums sent to the Site, i.e., drum reconditioning, sales or disposal.

Response: Not applicable, see Response #1.



**Chevron Corporation**

575 Market Street, San Francisco, California  
Mail Address: P.O. Box 7924, San Francisco, CA 94120-7924

San Francisco, CA  
September 18, 1992

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

**CONFIRMATION OF EXTENSION FOR  
INFORMATION REQUEST ON BAY AREA  
DRUM SITE, SAN FRANCISCO, CA**

Ms. Monica Gan  
Analyst  
Department of Toxic Substances Control  
700 Heinz Avenue, Suite 200  
Berkeley, CA 94710-2737

Dear Ms. Gan:

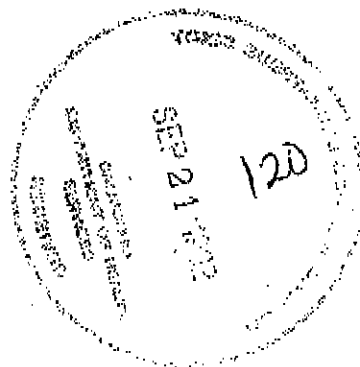
The purpose of this letter is to confirm the extension that you granted during our telephone conversation which took place today. During that conversation you granted Chevron Chemical Company a 30 calendar day extension on their response due date for DTSC's Request for Information on the above site. The response is now due October 18th.

Thank you for granting this extension. I can be reached at 415-894-2622.

Sincerely,

D.P. Tagliareni  
Superfund Specialist

DPT



COPY

## DEPARTMENT OF TOXIC SUBSTANCES CONTROL

REGION 2  
700 HEINZ AVE., SUITE 200  
BERKELEY, CA 94710-2737



August 31, 1992

Mr. Carl Crisp  
Chevron Chemical Company  
Building T, Room 2064  
6001 Bollinger Canyon Road  
San Ramon, California 94583-0947

Dear Mr. Crisp:

The California Environmental Protection Agency, Department of Toxic Substances Control (Department) has determined that the Bay Area Drum site, located at 1212 Thomas Avenue in San Francisco, California, has a groundwater contamination problem. Drum recycling and reconditioning activities were undertaken by several companies at the site from 1948 through 1987.

This letter is to request information regarding Chevron Chemical Company's past practices and business relationship with companies that operated at the Bay Area Drum (BAD) site including: Bedini Steel Drum, San Francisco Steel Drum, Myers Drum, Waymire Drum, and Bay Area Drum Company. We are requesting information from companies who did business with any of the site operators who operated at the BAD site. Information obtained as a result of the Department's investigation indicates your company sent drums to the BAD site for reconditioning and/or disposal. Consequently, the Department has identified Chevron Chemical Company as a Potentially Responsible Party (PRP) as defined in Section 25323.5(a). Pursuant to the authority of Health & Safety Code (H&SC) Sections 25185.6, 25358.1 and 25358.3, the Department requests that you provide all information currently known or available to you, as requested below, within 30 calendar days of this letter. Please provide an original and one copy to:

Monica Gan  
Department of Toxic Substances Control  
700 Heinz Avenue, Suite 200  
Berkeley, California 94710-2737

- 1) The approximate number of drums shipped to the BAD site between 1948 and 1987.
- 2) The nature of the substances contained in the drums, including chemical composition and concentration.
- 3) The type and capacity of each drum.



August 31, 1992

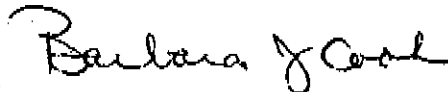
Page Two

- 4) The disposition of subject drums after the substances were used.
- 5) The residual level in each drum after they were shipped off-site.
- 6) Methods used to determine the residual levels in each drum.
- 7) Purpose of drums sent to the site, i.e., drum reconditioning, sales or disposal.

Compliance with the information request set forth is mandatory, pursuant to Sections 25185.6, 25358.1 and 25358.3 of the California Health & Safety Code. Failure to respond fully and truthfully to the information request may result in enforcement action by the Department, subject to the penalties allowed under Sections 25189, 25189.2, 25191 and 25367 of the Health & Safety Code. The penalty provided is up to \$25,000 for each violation and up to \$25,000 per day for each day that the violation continues. Please be further advised that provision of false, fictitious or fraudulent statements or representations may subject you to criminal penalties.

Thank you for your cooperation in this matter. If you have any questions relating to this request, please contact Susan Bertken, Senior Staff Attorney at (408) 429-0113 or Monica Gan, Analyst at (510) 540-3767.

Sincerely,



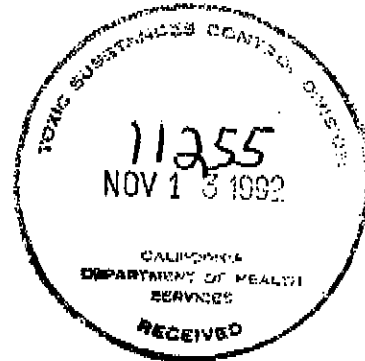
Barbara J. Cook, P.E., Chief  
Site Mitigation Branch

cc: Susan Bertken  
Senior Staff Attorney  
Toxics Legal Office  
Department of Toxic Substances Control  
P.O. Box 806  
Sacramento, California 95812-0806

Unocal Corporation  
1201 West 5th Street, P.O. Box 7600  
Los Angeles, California 90051  
Telephone (213) 977-7768  
Fax (213) 977-7827

**UNOCAL** 

Lois Ellen Gold  
Assistant Counsel



10 November 1992

**CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

Monica Gan  
Department of Toxic Substances Control  
770 Heinz Avenue, Suite 200  
Berkeley, California 94710-2737

**RE: RESPONSE TO REQUEST FOR INFORMATION  
BAY AREA DRUM SITE  
1212 THOMAS AVENUE  
SAN FRANCISCO, CALIFORNIA**

Dear Ms. Gan:

This letter sets forth the response of Union Oil Company of California, dba Unocal, to the referenced Request for Information.

Unocal has conducted a diligent investigation and in good faith we are submitting herein the results of our investigation. There were no records responsive to the questions. Although we are responding as thoroughly as is possible, there is little relevant information we are able to provide.

Randall N. Everson, Senior Project Engineer, conducted the record search of files archived in the Unocal Records Center in Palatine, Illinois. He found no reference to AMSCO/Unocal involvement with the listed address which was operated by Bedini Steel Drum, San Francisco Steel Drum, Myers Drum, Waymire Drum or Bay Area Drum Company during the 1948 through 1987 time frame.

Mr. Greg Graczyk, Accounts Receivable Clerk, at Unocal's Chemical Division Office in Schaumburg, Illinois, reviewed the

computerized files and found no reference to Waymire Drum or other facilities at the referenced address in the Bay Area.

Based on our investigation to date we found no documents referencing transactions of any nature or transfer of any material to the Bay Area Drum Site facility. We are responding, but without prejudice to the reservation of all rights to assert all appropriate objections and defenses. Unocal specifically reserves its rights to dispute any allegation or determination of liability of any share thereof assigned to it.

To the extent that subsequent record review reveals some nature of transaction between Unocal and Bay Area Drum Site, it is appropriate in this initial response to reserve the right to assert any and all exclusions that would apply under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), 42 U.S.C. Section 6904 (e) and Section 3007(a) of the Resources Conservation and Recovery Act (RCRA), 42 U.S.C. Section 9607(a) as well as relevant California State Laws, including but not limited to the California Health & Safety Code. In particular, should information indicate transfer, sale or deposit of materials subject to one or both of the following exclusions:

1. Petroleum exclusion from the definition of a hazardous substance under Section 101(14) of CERCLA.
2. Crude oil and natural gas exploration, development and production exclusion from the definition of a hazardous waste under 40 CFR 261.4(b)(5).

Without waiving any objections and reserving all rights to assert cited exclusions, as well as any and all other applicable exemptions, exclusions, defenses and arguments, we are enclosing the results of our review.

CAVEAT: In 1990 Unocal hired Mittelhauser Corp to audit/inspect reconditioners used by the chemical distribution division. In April 1990 Mittlehauser submitted a report on a Waymire Drum Company facility, located at 7702 Maie Avenue in Los Angeles, California. This is the only facility inspected or considered for Unocal use that was owned or operated by any of the companies listed in the referenced request for data. Unocal Oakland facility did not use this drum reconditioner.

Although we have discovered no documents in our records referencing the Bay Area facility, we have made a good faith effort to respond as fully as possible to the Request for Information.

Sincerely,

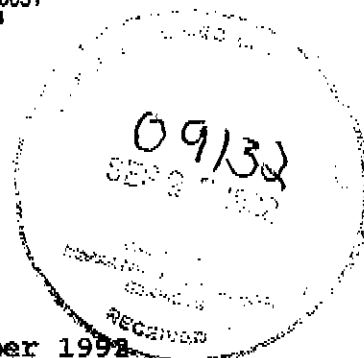
*Lad Ellen Gold*

cc: R. J. King  
R. N. Everson  
Susan Bertken, Senior Staff Attorney  
Toxics Legal Office  
Department of Toxic Substances Control  
P. O. Box 806  
Sacramento, California 95812-0806

6759

Unocal Corporation  
1201 West 5th Street, P.O. Box 7600  
Los Angeles, California 90051  
Telephone (213) 977-7768  
Fax (213) 977-7627

**UNOCAL** 76



22 September 1992

Lois Ellen Gold  
Assistant Counsel

Susan Bertken, Senior Staff Attorney  
Toxics Legal Office  
Department of Toxic Substances Control  
P. O. Box 806  
Sacramento, California 95812-0806

RE: BAY AREA DRUM SITE  
1212 THOMAS AVENUE  
SAN FRANCISCO, CALIFORNIA

Dear Ms. Bertken:

This letter will confirm the extension you granted Union Oil Company of California, dba Unocal, until 15 November 1992 for its response to the Information Request pertaining to the referenced facility. We are in the process of interviewing employees and reviewing files and shall make a good faith effort to provide you with whatever relevant data, if any, we find.

Thank you for your courtesy.

Sincerely,

cc: D. W. Dierwechter  
R. Emerson  
R. J. King  
Monica Gan ✓

Department Of Toxic Substances Control  
700 Heinz Avenue, Suite 200  
Berkeley, California 94710-2737

6506

## DEPARTMENT OF TOXIC SUBSTANCES CONTROL

REGION 2  
700 HEINZ AVE., SUITE 200  
BERKELEY, CA 94710-2737



August 31, 1992

Ms. Lois Ellen Gold, Esq.  
Assistant Counsel  
Unocal Corporation (formerly Amsco)  
1201 West 5th Street  
Los Angeles, California 90051

Dear Ms. Gold:

The California Environmental Protection Agency, Department of Toxic Substances Control (Department) has determined that the Bay Area Drum site, located at 1212 Thomas Avenue in San Francisco, California, has a groundwater contamination problem. Drum recycling and reconditioning activities were undertaken by several companies at the site from 1948 through 1987.

This letter is to request information regarding Amsco's past practices and business relationship with companies that operated at the Bay Area Drum (BAD) site including: Bedini Steel Drum, San Francisco Steel Drum, Myers Drum, Waymire Drum, and Bay Area Drum Company. We are requesting information from companies who did business with any of the site operators who operated at the BAD site. Information obtained as a result of the Department's investigation indicates your company sent drums to the BAD site for reconditioning and/or disposal. Consequently, the Department has identified Amsco as a Potentially Responsible Party (PRP) as defined in Section 25323.5(a). Pursuant to the authority of Health & Safety Code (H&SC) Sections 25185.6, 25358.1 and 25358.3, the Department requests that you provide all information currently known or available to you, as requested below, within 30 calendar days of this letter. Please provide an original and one copy to:

Monica Gan  
Department of Toxic Substances Control  
700 Heinz Avenue, Suite 200  
Berkeley, California 94710-2737

- 1) The approximate number of drums shipped to the BAD site between 1948 and 1987.
- 2) The nature of the substances contained in the drums, including chemical composition and concentration.
- 3) The type and capacity of each drum.

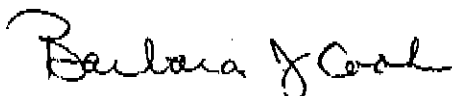


- 4) The disposition of subject drums after the substances were used.
- 5) The residual level in each drum after they were shipped off-site.
- 6) Methods used to determine the residual levels in each drum.
- 7) Purpose of drums sent to the site, i.e., drum reconditioning, sales or disposal.

Compliance with the information request set forth is mandatory, pursuant to Sections 25185.6, 25358.1 and 25358.3 of the California Health & Safety Code. Failure to respond fully and truthfully to the information request may result in enforcement action by the Department, subject to the penalties allowed under Sections 25189, 25189.2, 25191 and 25367 of the Health & Safety Code. The penalty provided is up to \$25,000 for each violation and up to \$25,000 per day for each day that the violation continues. Please be further advised that provision of false, fictitious or fraudulent statements or representations may subject you to criminal penalties.

Thank you for your cooperation in this matter. If you have any questions relating to this request, please contact Susan Bertken, Senior Staff Attorney at (408) 429-0113 or Monica Gan, Analyst at (510) 540-3767.

Sincerely,



Barbara J. Cook, P.E., Chief  
Site Mitigation Branch

cc: Susan Bertken  
Senior Staff Attorney  
Toxics Legal Office  
Department of Toxic Substances Control  
P.O. Box 806  
Sacramento, California 95812-0806

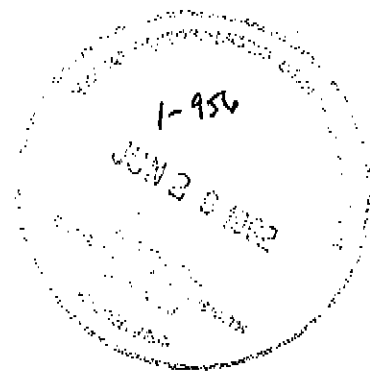


1276 HALYARD DRIVE • WEST SACRAMENTO, CA 95691 • TELEPHONE (916) 372-7011

June 25, 1992

Ms. Monica Gan  
California Environmental Protection Agency  
Department of Toxic Substances Control  
700 Heinz Avenue  
Building F  
Berkeley, CA 94710

RE: Information Request Response  
Bay Area Drum Site  
1212 Thomas Avenue  
San Francisco, CA



Dear Ms. Gan:

Below are my responses to your May 22, 1992 letter requesting information about PureGro Company's past business relationship with the Bay Area Drum site located at 1212 Thomas Avenue, San Francisco, California. In responding to your information request, I was unable to locate written documents pertaining to the nature of the transactions between PureGro and the BADC. Consequently, many of the attached responses were obtained through employee interviews.

At this time, I am unable to respond to question one. I am currently reviewing company invoices pertaining to the reconditioning and/or shipment of drums to the BADC site. However, due to the large quantity of company records, I do not anticipate being able to provide you with a response until after July 15, 1992. Please consider this letter a request for an extension to complete question one. I will forward you a response to this question as soon as it is available.

If you have any questions concerning the information provided, please give me a call at either (916) 373-3122 or the above number.

Sincerely,

Patrick G. Durham  
Supervisor of Env. Compliance Programs

/PD  
Attachment

cc: Bob Ustick  
April Pearson

ATTACHMENT I

INFORMATION REQUEST RESPONSES

Q1. What is the approximate number of drums shipped to the BADC site between 1948 through 1987?

A1. Response Pending. Approximate number currently unknown.

Q2. What is the nature of the substance contained in the subject drums?

A2. All drums were emptied prior to reconditioning. Drums would have contained the following product:

PRODUCT NAME -	Gavicide Super 90 Spray Oil
GENERIC NAME -	Paraffinic Spray Oil
HAZARDOUS COMPONENTS -	No hazardous components identified as per 29 CFR 1910.120.
OTHER COMPONENTS -	Mineral Oil (CAS# 8012-95-1) Oil Mist, if generated (CAS# 8012-95-1)

Q3. What is the type and capacity of each drum?

A3. 30 gallon steel drums for the storage of Gavicide Super 90 Spray Oil.

Q4. The disposition of drums after the substances were used.

Most of the drums were steam cleaned prior to being sent back for reconditioning. Those drums containing no visual product were not steam cleaned. All drums of good integrity were reconditioned and shipped back to PureGro (empty) for reuse as Gavicide Super 90 Spray oil containers.

Q5. What was the residual level in each drum after they were shipped off-site?

A5. Records not available.

**Q6. Methods used to determine the residual level in each drum?**

**A6. Visual observations were made by employees to determine if the drum(s) should be steam cleaned prior to being shipped off-site.**

**Q7. Were drums sent to the BADC for reconditioning?**

**A7. Yes.**

**Q8. Were drums sent to the BADC for disposal?**

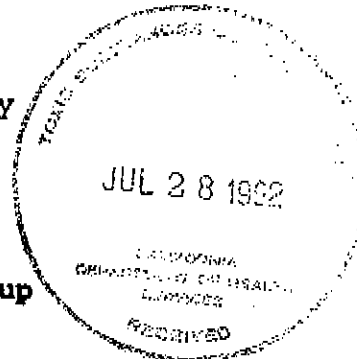
**A8. No.**



1276 HALYARD DRIVE • WEST SACRAMENTO, CA 95691 • TELEPHONE (916) 372-7011

July 23, 1992

Ms. Monica Gan  
California Environmental Protection Agency  
Department of Toxic Substances Control  
700 Heinz Avenue  
Building F  
Berkeley, CA 94710



**RE: Information Request Response Follow-up  
Bay Area Drum Site  
1212 Thomas Avenue  
San Francisco, CA**

Dear Ms. Gan:

In response to your May 22, 1992 information request, I have completed my review of PureGro Company's files pertaining to the Bay Area Drum Site at 1212 Thomas Avenue, San Francisco, California. On June 25, 1992, all responses to your information request, with the exception of Question 1, were forwarded to your attention. Below is PureGro Company's response to Question 1.

**Q1. What is the approximate number of drums shipped to the BADC site between 1984 through 1987?**

**A1. Data unavailable.** No records exist indicating the quantity of drums that PureGro Company either shipped to or received from Meyers Drum Company. In addition, no records exist pertaining to the purchasing or shipping of drums to the Bay Area Drum Company, Bedini Drum Company, San Francisco Steel Drum Company or the Waymire Drum Company.

If you have any questions concerning the information provided, please give me a call at (916) 373-3122.

Sincerely,

Patrick G. Durham  
Supervisor of Environmental Compliance Programs

/PD

cc: Bob Ustick  
April Pearson  
Joe Armao



1276 HALYARD DRIVE • WEST SACRAMENTO, CA 95691 • TELEPHONE (916) 372-7011

June 19, 1992

Ms. Monica Gan  
California - Environmental Protection Agency  
Department of Toxic Substances Control  
Region 2  
700 Heinz Avenue, Suite 200  
Berkeley, CA 94710-2737

RE: Information Request  
Bay Area Drum Site  
1212 Thomas Avenue  
San Francisco, CA

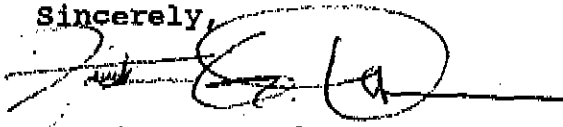
Dear Ms. Gan:

I have received your May 22, 1992 information requested regarding PureGro Company's past business relationship with the Bay Area Drum Company site located at 1212 Thomas Avenue, San Francisco, CA. To provide you with accurate and specific responses to these questions, I am conducting an extensive search of our files. The information request is currently in progress.

As a result, I will not be able to provide you with responses to the information request by June 22, 1992. In my discussions with you on June 19, 1992, you agreed to extend the deadline to June 26, 1992. Responses to your request will be forwarded to your attention on this date.

If you have any questions concerning the information provided, please give me a call at the above number or (916) 373-3122.

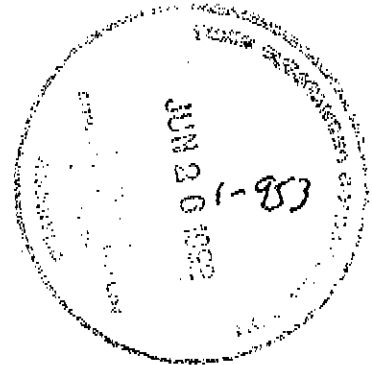
Sincerely,

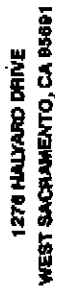


Patrick G. Durham  
Sup. of Environmental Compliance Programs

/PD

cc: April Pearson  
Matt Smith





U.S. AIR MAIL 0.25  
JAN 22 1965  
SACRAMENTO, CALIF.

[illegible]

## DEPARTMENT OF TOXIC SUBSTANCES CONTROL

REGION 2

700 HEINZ AVE., SUITE 200

BERKELEY, CA 94710-2737



May 22, 1992

R.W. Ustick  
President  
Puregro Company  
1276 Halyard Drive  
West Sacramento, CA 95691

Dear Mr. Ustick:

This letter is to request information regarding the Puregro Company's past business relationship with the Bay Area Drum Company site (BADC) located at 1212 Thomas Avenue, San Francisco. Companies that operated at this site include: Bay Area Drum Company, Bedini Drum, San Francisco Steel Drum, Waymire Drum Company and Myers Drum. We are requesting information from those companies who did business with any of the companies that operated at the BADC site to obtain information regarding the type and quantity of hazardous substances that were sent to the BADC site.

The Department is interested in the nature of transactions between the Puregro Company and the BADC site. Please answer the following questions as specifically as possible:

- 1) The approximate number of drums shipped to the BADC site between 1948 through 1987.
- 2) The nature of the substances contained in subject drums
- 3) The type and capacity of each drum
- 4) The disposition of subject drums after the substances were used
- 5) The residual level in each drum after they were shipped offsite
- 6) Methods used to determine the residual levels in each drum
- 7) Were drums sent to the BADC for reconditioning?
- 8) Were drums sent to the BADC for disposal?

Please provide responses to the aforementioned questions within thirty (30) days of the date of this letter. Compliance with the information request set forth is mandatory pursuant to sections 25185.6, 25358.1 and 25358.3 of the California Health and Safety Code. Failure to respond fully and truthfully to the information request may result in enforcement action by the Department, subject to



the penalties allowed under Sections 25189, 25189.2, 25191 and 25367 of the Health and Safety Code. The penalty provided is up to \$25,000 for each violation and up to \$25,000 per day for each day that the violation continues. Please be further advised that provision of false, fictitious or fraudulent statements or representations may subject you to criminal penalties.

Please send your response to: Monica Gan  
Cal-EPA, Dept. of Toxic  
Substances Control  
700 Heinz Ave. Bldg. F  
Berkeley, CA 94710

I can be contacted at (510) 540-3767 if you have any questions regarding this matter.

Sincerely,

*Monica Gan*

Monica Gan,  
Staff Services Analyst  
Site Mitigation Branch

cc: Susan Bertken  
Senior Staff Attorney  
Dept. of Toxic Substances Control  
P.O. Box 806,  
Sacramento, CA 95814